

For Six Month Period Ending \_\_\_\_\_  
(Insert date)

Name of Registrant

Registration No.

DEVELOPMENT COUNSELLORS INTERNATIONAL LTD.

1421

Business Address of Registrant

733 Third Avenue  
New York, N. Y. 10017

**I—REGISTRANT**

1. Has there been a change in the information previously furnished in connection with the following:

(a) If an individual:

(1) Residence address	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(2) Citizenship	Yes <input type="checkbox"/>	No <input type="checkbox"/>
(3) Occupation	Yes <input type="checkbox"/>	No <input type="checkbox"/>

(b) If an organization:

(1) Name	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(2) Ownership or control	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
(3) Branch offices	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>

2. Explain fully all changes, if any, indicated in item 1.

Not applicable

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSE TO ITEMS 3, 4, and 5.

3. Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

Name

Position

Date Connection  
Ended

Not applicable

4. Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?  
 Yes ☐ No ☒

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Citizenship</i>	<i>Position</i>	<i>Date Assumed</i>
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~~Not Applicable~~

5. Has any person named in Item 4 rendered services directly in furtherance of the interests of any foreign principal?  
 Yes ☐ No ☒

If yes, identify each such person and describe his services.

Not applicable

6. Have any employees or individuals other than officials, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

<i>Name</i>	<i>Position or connection</i>	<i>Date terminated</i>
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Not applicable

7. During this 6 month reporting period, have any persons been hired as employees or in any other capacity by the registrant who rendered services to the registrant directly in furtherance of the interests of any foreign principal in other than a clerical or secretarial, or in a related or similar capacity? Yes ☐ No ☒

If yes, furnish the following information:

<i>Name</i>	<i>Residence Address</i>	<i>Position or connection</i>	<i>Date connection began</i>
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Not applicable

## II—FOREIGN PRINCIPAL

(PAGE 3)

8. Has your connection with any foreign principal ended during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

*Name of foreign principal*

*Date of Termination*

Not applicable

9. Have you acquired any new foreign principal<sup>1</sup> during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish following information:

*Name and address of foreign principal*

*Date acquired*

BARBADOS INDUSTRIAL DEVELOPMENT CORPORATION  
800 Second Avenue  
New York, NY 10017

9/1/85

10. In addition to those named in Items 8 and 9, if any, list the foreign principals<sup>1</sup> whom you continued to represent during the 6 month reporting period.

GLENROTHES DEVELOPMENT CORPORATION  
NEWFOUNDLAND DEPT. OF INDUSTRIAL DEVELOPMENT  
AUSTRALIAN TOURIST COMMISSION

## III—ACTIVITIES

11. During this 6 month reporting period, have you engaged in any activities for or rendered any services to any foreign principal named in Items 8, 9, and 10 of this statement? Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail your activities and services:

GLENROTHES DEVELOPMENT CORP.: Informed U. S. businessmen about opportunities in Scotland and answered inquiries via telephone.

BARBADOS IDC: Publicized and informed U. S. businessmen about opportunities in Barbados through feature articles in business magazines, public appearances, interviews with the press, press releases and a newsletter.

AUSTRALIAN TOURIST COMMISSION: Promoted travel to Australia via feature articles in trade and consumer publications; coordinated group & individual press tours to Australia; placed Australian spokespeople on appropriate radio & TV programs, and other associated public communications/publicity activities.

NEWFOUNDLAND ID: Arranged speaking engagements, answered mail inquiries, wrote press releases.

<sup>1</sup>The term "foreign principal" includes, in addition to those defined in section 1(b) of the Act, an individual or organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a)(9)).

A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those foreign principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

12. During this 6 month reporting period, have you on behalf of any foreign principal engaged in political activity<sup>2</sup> as defined below?

Yes ☒ No ☐

If yes, identify each such foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures or radio and TV broadcasts, give details as to dates, places of delivery, names of speakers and subject matter.

Activities engaged in have been detailed in answer to Question 11 of this report.

13. In addition to the above described activities, if any, have you engaged in activity on your own behalf which benefits any or all of your foreign principals? Yes ☐ No ☒

If yes, describe fully.

Not applicable

<sup>2</sup>The term "political activities" means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policy of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

## IV—FINANCIAL INFORMATION

## 14. (a) RECEIPTS—MONIES

During this 6 month reporting period, have you received from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal, any contributions, income or money either as compensation or otherwise? Yes ☒ No ☐

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.<sup>3</sup>

<i>Date</i>	<i>From Whom</i>	<i>Purpose</i>	<i>Amount</i>
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See attached listing of receipts.

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Total

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## (b) RECEIPTS—THINGS OF VALUE

During this 6 month reporting period, have you received any thing of value<sup>4</sup> other than money from any foreign principal named in Items 8, 9 and 10 of this statement, or from any other source, for or in the interests of any such foreign principal? Yes ☐ No ☒

If yes, furnish the following information:

<i>Name of foreign principal</i>	<i>Date received</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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Not applicable

<sup>3</sup>A registrant is required to file an Exhibit D if he collects or receives contributions, loans, money, or other things of value for a foreign principal, as part of a fund raising campaign. See Rule 201(c).  
<sup>4</sup>Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) **DISBURSEMENTS—MONIES**

During this 6 month reporting period, have you

(1) disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 8, 9 and 10 of this statement?      Yes ☒      No ☐

(2) transmitted monies to any such foreign principal?      Yes ☐      No ☒

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

<i>Date</i>	<i>To Whom</i>	<i>Purpose</i>	<i>Amount</i>
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See attached list of cash disbursement on behalf of foreign principals.

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Total

## 15. (b) DISBURSEMENTS—THINGS OF VALUE

During this 6 month reporting period, have you disposed of anything of value<sup>5</sup> other than money in furtherance of or in connection with activities on behalf of any foreign principal named in items 8, 9 and 10 of this statement?

Yes ☐ No ☒

If yes, furnish the following information:

<i>Date disposed</i>	<i>Name of person to whom given</i>	<i>On behalf of what foreign principal</i>	<i>Description of thing of value</i>	<i>Purpose</i>
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Not applicable

## (c) DISBURSEMENTS—POLITICAL CONTRIBUTIONS

During this 6 month reporting period, have you from your own funds and on your own behalf either directly or through any other person, made any contributions of money or other things of value<sup>5</sup> in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes ☐ No ☒

If yes, furnish the following information:

<i>Date</i>	<i>Amount or thing of value</i>	<i>Name of political organization</i>	<i>Name of candidate</i>
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Not applicable

## V—POLITICAL PROPAGANDA

(Section 1(j) of the Act defines "political propaganda" as including any oral, visual, graphic, written, pictorial, or other communication or expression by any person (1) which is reasonably adapted to, or which the person disseminating the same believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, or in any other way influence a recipient or any section of the public within the United States with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party or with reference to the foreign policies of the United States or promote in the United States racial, religious, or social dissensions, or (2) which advocates, advises, instigates, or promotes any racial, social, political, or religious disorder, civil riot, or other conflict involving the use of force or violence in any other American republic or the overthrow of any government or political subdivision of any other American republic by any means involving the use of force or violence.)

16. During this 6 month reporting period, did you prepare, disseminate or cause to be disseminated any political propaganda as defined above? Yes ☒ No ☐

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

17. Identify each such foreign principal.

GLENROTHES DEVELOPMENT CORP.  
AUSTRALIAN TOURIST COMMISSION  
NEWFOUNDLAND DEPT. OF DEVELOPMENT  
BARBADOS INDUSTRIAL DEVELOPMENT CORP.

<sup>5</sup>Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

18. During this 6 month reporting period, has any foreign principal established a budget or allocated a specified sum of money to finance your activities in preparing or disseminating political propaganda? Yes ☐ No ☒

If yes, identify each such foreign principal, specify amount, and indicate for what period of time.

Not applicable

19. During this 6 month reporting period, did your activities in preparing, disseminating or causing the dissemination of political propaganda include the use of any of the following:

☐ Radio or TV broadcasts    ☒ Magazine or newspaper articles    ☐ Motion picture films    ☒ Letters or telegrams  
☐ Advertising campaigns    ☒ Press releases    ☒ Pamphlets or other publications    ☒ Lectures or speeches

☐ Other (specify) \_\_\_\_\_

20. During this 6 month reporting period, did you disseminate or cause to be disseminated political propaganda among any of the following groups:

☐ Public Officials    ☒ Newspapers    ☐ Libraries  
☐ Legislators    ☐ Editors    ☐ Educational institutions  
☐ Government agencies    ☐ Civic groups or associations    ☐ Nationality groups  
☐ Other (specify) \_\_\_\_\_

21. What language was used in this political propaganda:

☒ English    ☐ Other (specify) \_\_\_\_\_

22. Did you file with the Registration Section, U.S. Department of Justice, two copies of each item of political propaganda material disseminated or caused to be disseminated during this 6 month reporting period? Yes ☒ No ☐

23. Did you label each item of such political propaganda material with the statement required by Section 4(b) of the Act? Yes ☒ No ☐

24. Did you file with the Registration Section, U.S. Department of Justice, a Dissemination Report for each item of such political propaganda material as required by Rule 401 under the Act? Yes ☒ No ☐

## VI—EXHIBITS AND ATTACHMENTS

### 25. EXHIBITS A AND B

- (a) Have you filed for each of the newly acquired foreign principals in Item 9 the following:

Exhibit A<sup>6</sup>    Yes ☒    No ☐  
 Exhibit B<sup>7</sup>    Yes ☒    No ☐

If no, please attach the required exhibit.

- (b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal whom you represented during this six month period? Yes ☐ No ☒

If yes, have you filed an amendment to these exhibits? Yes ☐ No ☐

If no, please attach the required amendment. Not applicable

<sup>6</sup>The Exhibit A, which is filed on Form CRM-157 (Formerly OBD-67) sets forth the information required to be disclosed concerning each foreign principal.

<sup>7</sup>The Exhibit B, which is filed on Form CRM-155 (Formerly OBD-65) sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.



## 26. EXHIBIT C

If you have previously filed an Exhibit C<sup>8</sup>, state whether any changes therein have occurred during this 6 month reporting period. Yes ☐ No ☒

If yes, have you filed an amendment to the Exhibit C? Yes ☐ No ☐ Not applicable

If no, please attach the required amendment.

## 27. SHORT FORM REGISTRATION STATEMENT

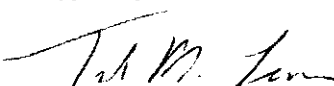
Have short form registration statements been filed by all of the persons named in Items 5 and 7 of the supplemental statement? Yes ☐ No ☐

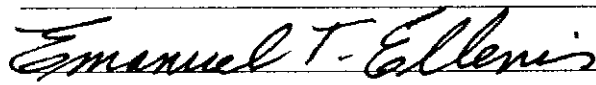
If no, list names of persons who have not filed the required statement.

Not applicable

The undersigned swear(s) or affirm(s) that he has (they have) read the information set forth in this registration statement and the attached exhibits and that he is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his (their) knowledge and belief, except that the undersigned make(s) no representation as to the truth or accuracy of the information contained in attached Short Form Registration Statement, if any, insofar as such information is not within his (their) personal knowledge. We declare under penalty of perjury that the foregoing is true and correct. Executed on February 27th, 1986.  
(Type or print name under each signature)

(Both copies of this statement shall be signed and sworn to before a notary public or other person authorized to administer oaths by the agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions who are in the United States, if the registrant is an organization.)

  
Ted M. Levine - President

  
Emanuel T. Ellenis - Exec. Vice-President

Subscribed and sworn to before me at \_\_\_\_\_

this \_\_\_\_\_ day of \_\_\_\_\_, 19 \_\_\_\_\_

\_\_\_\_\_  
(Signature of notary or other officer)

<sup>8</sup>The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, Criminal Division, Internal Security Section, U.S. Department of Justice, Washington, D.C. 20530.)

# AUSTRALIAN TOURIST COMMISSION

Cash Receipts:	Fee	Expenses	Total
7/2/85		2,033.41	2,033.41
7/24	13,995.00		13,995.00
10/1	27,900.00	5,536.03	33,436.03
11/6	12,000.00	2,783.38	14,783.38
12/9	12,000.00	1,904.35	13,904.35
Totals	65,895.00	12,257.17	78,152.17

Cash Disbursements:	Name	ATC	Amt.	Type
8/15/85	Allnet Communic.		140.38	Telephone
	A-1 Intl. Courier		71.05	Messsenger
	Luce Press Clippings		435.97	Clippings
8/22	Federal Express		95.20	Messenger
	Media Distrib. Serv.		192.27	Product.
8/28	E. T. Ellenis		23.10	Entertain.
9/4	CLIO		45.00	Prints
9/5	A-1 Intl courier		26.60	Messenger
	A-1 Intl. Courier		68.35	Messenger
9/12	Allnet Commun. Serv.		150.83	Telephone
9/18	Visual Aid Serv.		7.00	Stats
9/24	Federal Express		14.00	Messenger
10/2	Aviso, Inc		6,854.83	Fees & Expen.
	Bendel & Assoc.		8,699.00	Fees
	Peggy R. Bendel		2,027.52	Expenses
	Leroy Liss Studios		128.00	Photos
	Luce Press Clip.		199.40	Clippings
	Media Distrib. Serv.		390.72	Product.
10/3	A-1 Messenger		129.40	Messenger
	Federal Express		265.00	Express
10/10	A-1 Messsenger		42.30	Messenger
	Federal Express		25.00	Express
	Western Union		27.81	Telegraph
10/24	Visual Aid Serv.		7.79	Stats
	Allnet Commun.		110.85	Telephone
11/6	Bendel Assoc.		4,033.00	Fees
	Aviso, Inc.		5,281.64	Fee & Exp.
	Peggy Bendel		81.00	Expenses
	A-1 Intl. Courier		65.55	Messenger
	Federal Express		232.00	Messsenger
	Luce Press Clippings		208.92	Clippings
11/20	Allnet Communic.		217.70	Telephone
	A-1 Messenger Serv.		106.25	Messenger
	A-1 Messenger Serv.		142.25	Messsenger
	Media Distrib. Serv.		653.46	Product.
12/5	Devlin Productions		292.65	Product.
12/10	Devlin Productions		45.47	Product
12/12	A-1 Courier		92.60	Messenger
	Luce Press Clippings		251.36	Clips
12/16	Ted M. Levine		26.00	Entertain.

12/17	Aviso Inc.	3,200.00	Fees
	Aviso, Inc.	352.16	Expenses
	Bendel Assoc.	4,033.00	Fee
	Visual Aid Serv.	157.36	Stats
	Federal Express	159.25	Messenger
12/26	A-1 Courier	93.50	Messenger
	Media Distrib.	427.70	Product.
	Allnet Communic.	134.63	Telephone
1/8/86	Federal Express	74.35	Messenger
	A-1 Intl.Courier	329.30	Messenger
	Federal Express	43.00	Messenger
	Allnet Communic.	150.82	Telephone
	Visual Aids Services	9.09	Stats
1/15	The Deli Place	85	Luncheon
1/16	Diana Pons	210	Clerical
1/20	Ted M. Levine	16.9	Entertain.
1/22	Luce Press Clippings	259.15	Clips
1/27	P. T. Levine	2.75	Cab
	Elis.Jereski	151.25	Clerical
1/29	Elis. Jereski	60.12	Clerical

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Total 41,856.55  
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# BARBADOS IDC

Cash Receipts:	Fee	Expenses	Total
10/10/85	3,000.00	26.36	3,026.36
11/13	3,000.00	162.72	3,162.72
12/17	3,000.00	1,392.28	4,392.28
1/21/86	3,000.00	343.49	3,343.49
Totals	12,000.00	1,924.85	13,924.85

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Cash Disbursements:	Name	Barb.	Amt.	Type
8/19/85	Ted M. Levine	30.95	Entertain.	
9/3	Ted M. Levine	31.15	Entertain.	
9/30	Ted M. Levine	31.2	Entertain.	
10/24	Allnet Communic.	35.11	Telephone	
11/6	Visual Aid Serv.	14.46	Stats	
	A-1 Messenger Serv.	9.9	Messenger	
11/11	Ted M. Levine	58.85	Entertain.	
11/14	Patricia T. Levine	141.65	Entertain.	
11/20	AllNet Communic.	5.76	Telephone	
	Visual Aid Serv.	29.44	Stats	
	A-1 Messenger Serv.	9.90	Messenger	
11/25	Ted M. Levine	33.15	Entertain.	
12/12	A-1 Courier	107.40	Messenger	
	Chase Dir.Mail	369.57	Product.	
	Hopkins Assoc.	50.07	Product.	
	Luce Press Clippings	22.21	Clips	
12/17	Federal Express	80.00	Messenger	
12/26	A-1 Courier	42.00	Messenger	

	Amer. Express	45.50	Entertain
	Allnet Communic.	111.48	Telephone
1/8/86	A-1 Intl. Courier	18.70	Messenger.
1/13	A-1 Intl. Courier	14.85	Messenger
	Allnet Communic.	1.18	Telephone
1/22	Luce Press Clippings	8.26	Clips
	Wide World Photos	183.54	Photos

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 Totals: 1,486.48  
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#### GLENROTHES

Cash Receipts:	Fee	Expenses	Total
9/30/85	240.00	75.00	315.00
10/24	360.00	75.00	435.00
1/17/86	240.00	75.00	315.00
1/29	240.00	75.00	315.00
Totals	1,080.00	300.00	1,380.00

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Cash Disbursements: Name	Glen.	Amt.	Type
		0	

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Total	0
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#### HELLENIC DEVELOPMENT

Cash Receipts:	Fee	Expenses	Total
7/17/85		1,017.00	1,017.00
7/22	1,451.61	234.72	1,686.33
Totals	1,451.61	1,251.72	2,703.33

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Cash Disbursements: Name	HDC	Amnt.	Type
8/15/85	Allnet Communications	0.84	Telephone
	Saddle River Studios	50.00	Product.
8/19	E. T. Ellenis	39.60	Entertain.
8/28	E. T. Ellenis	16.00	Entertain.
Totals		106.44	

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#### NEWFOUNDLAND

Cash Receipts:	Fee	Collection Charge	Total
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7/15/85	5,691.67	1,634.78	4,056.89
7/29	5,691.67	1,639.20	4,052.47
9/5	5,691.67	1,700.67	3,991.00
10/8	5,691.67	1,687.01	4,004.66
11/7	5,691.67	1,717.75	3,973.92
12/2/86	5,691.67	1,754.74	3,936.93
1/21/86	5,691.67	1,836.13	3,855.54
1/28	5,691.67	1,828.16	3,863.51

Totals	39,841.69	11,970.28	27,871.41
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Cash Disbursements:	Name	NFD	Amt.	Type
8/15/85	Allnet Communications		10.96	Telephone
12/2	Emanuel T. Ellenis		46.60	Entertain.
12/3	Amer. Express		30.70	Entertain.
12/12	A-1 Courier		4.95	Messenger
12/17	E. T. Ellenis		101.50	Entertain.
12/26	Amer. Express		32.65	Entertain.
12/26	Allnet Communic.		1.82	Telephone
1/8/86	A-1 Intl. Courier		32.30	Messenger
1/13	Allnet Communic.		8.08	Telephone
	Evening Telegram		70.00	Suscrip.
	A-1 Intl. Courier		4.95	Messenger
	Hopkins Assoc.		16.78	Product.
	Visual Aids Services		27.71	Stats
1/22	K+L Custom Serv.		171.26	Product,
	McGraw-Hill		1069.34	Luncheon
	PR Newswire		160.00	Telex
	Purolater Courier		19.75	Messenger
1/28	Amer. Express		617.35	Travel & Ent.
Total			2,426.70	

UNITED STATES DEPARTMENT OF JUSTICE  
REGISTRATION UNIT  
CRIMINAL DIVISION  
WASHINGTON, D. C. 20530

NOTICE

Please answer the following questions and return this sheet in triplicate with your supplemental statement:

1. Is your answer to Item 16 of Section V (Political Propaganda - page 7 of Form OBD-64 - Supplemental Statement):

Yes \_\_\_\_\_ Yes \_\_\_\_\_ or No \_\_\_\_\_

(If your answer to question 1 is "yes" do not answer question 2 of this form.)

2. Do you disseminate any material in connection with your registration:

Yes \_\_\_\_\_ or No \_\_\_\_\_

(If your answer to question 2 is "yes" please forward for our review copies of all such material including: films, film catalogs, posters, brochures, press releases, etc. which you have disseminated during the past six months.)



Signature

Feb. 27, 1986

Date

Ted M. Levine

Please type or print name of  
signatory on the line above

President

Title